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### UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

(ECF Case)

IN RE ROYAL BANK OF SCOTLAND GROUP PLC SECURITIES LITIGATION

09 Civ. 300 (DAB)

# MOTION FOR PRO HAC VICE ADMISSION

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Joseph P. Guglielmo, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of:

> Mary K. Blasy Scott+Scott LLP 707 Broadway, Suite 1000 San Diego, CA 92101 Tel: (619) 233-4565

Fax: (619) 233-0508

Ms. Blasy is a member in good standing of the Bar of the State of California, from which a Certificate of good standing is attached hereto. There are no pending disciplinary proceedings against Ms. Blasy in any State or Federal court.

DATED: February 10, 2011

JOSEPJI P. GUĞLIELMO (JG 2447)

500 Fifth Avenue, 40th Floor

New York, NY 10110 Tel: 212/223-6444

Fax: 212/223-6334

Email: jguglielmo@scott-scott.com

Counsel for Irving Firemen's Relief and Retirement Fund



# Supreme Court of California

FREDERICK K. OHLRICH

Clerk of the Court

# CERTIFICATE OF THE CLERK OF THE SUPREME COURT

#### OF THE

### STATE OF CALIFORNIA

## MARY KATHERINE BLASY

I, FREDERICK K. OHLRICH, Clerk of the Supreme Court of the State of California, do hereby certify that MARY KATHERINE BLASY was on the 7TH day of DECEMBER, 2000, duly admitted to practice as an attorney and counselor at law in all the courts of this state; and is now listed on the Roll of Attorneys as a member of the bar of this state in good standing.

Witness my hand and the seal of the court on the 2ND day of FEBRUARY, 2011.

FREDERICK K. OHLRICH

Clerk of the Supreme Court

Deputy Clerk

# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

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| IN RE ROYAL BANK OF SCOTLAND GROUP PLC SECURITIES LITIGATION |   | (ECF Case)<br>09 Civ. 300 (DAB) |
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#### AFFIDAVIT OF JOSEPH P. GUGLIELMO

### FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION

| State of New York  | )     |
|--------------------|-------|
|                    | ) ss: |
| County of New York | )     |

Joseph P. Guglielmo, being duly sworn, hereby deposes and says as follows:

- 1. I am an attorney at law at Scott+Scott LLP, counsel for Movant and proposed intervenor plaintiff Irving Firemen's Relief and Retirement Fund ("Plaintiff/Intervenor" or "Irving Firemen") in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Irving Firemen's motion to admit Mary K. Blasy as counsel *pro hac vice* to represent Plaintiff/Intervenor in this matter.
- 2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1996. I am also admitted to the bar of the United States District Courts for the Southern and Eastern Districts of New York, and am in good standing with these Courts.
  - 3. I have known Mary K. Blasy since 2006.
- 4. Ms. Blasy is a member of the law firm, Scott+Scott LLP, and is located in the San Diego, California office.

- 5. I have found Ms. Blasy be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
- 6. Accordingly, I am pleased to move for the admission of Mary K. Blasy, *pro hac vice*.
- 7. I respectfully submit a proposed order granting the admission of Mary K. Blasy, *pro hac vice*, which is attached hereto as Exhibit A.

WHEREFORE, it is respectfully requested that the motion to admit Mary K. Blasy, *pro hac vice*, to represent Plaintiff/Intervenor in the above-captioned matter, be granted.

Dated: February 10, 2011

Respectfully submitted.

JOSEPHAP. GUGLIELMO (JG-2447)

SCOTT+SCOTT LLP 500 Fifth Avenue, 40<sup>th</sup> Floor

New York, NY 10110

Telephone: 212-223-6444 Facsimile: 212-223-6334 iguglielmo@scott-scott.com

Subscribed and sworn to before me this

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Notary Public

ANN E. SLAUGHTER
Notary Public-State of New York
No. 01SL6183108
Qualified in Bronx County
Commission Expires March 10, 2012

| UNITED STATES DISTRICT COURT  |
|-------------------------------|
| SOUTHERN DISTRICT OF NEW YORK |

### **EXHIBIT A**

#### PROPOSED ORDER GRANTING ADMISSION OF

# MARY K. BLASY PRO HAC VICE

Upon the motion of Joseph P. Guglielmo, attorney for Movant and Plaintiff/Intervenor, and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that:

Mary K. Blasy Scott+Scott LLP 707 Broadway, 10<sup>th</sup> Floor San Diego, CA 92101 Telephone: (619) 233-4565

Facsimile: (619) 233-0508 Email Address: mblasy@scott-scott.com

is admitted to practice *pro hac vice* as counsel for Intervenor Plaintiff Irving Firemen in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. Counsel shall immediately apply for an ECF password at <u>nysd.uscourts.gov</u>, and shall forward the *pro hac vice* fee to the Clerk of the Court.

| Dated:      | , 2011 |                              |
|-------------|--------|------------------------------|
| New York, N | Y      | HON. DEBORAH A. BATTS        |
|             |        | United States District Judge |

### **PROOF OF SERVICE**

I hereby certify that a copy of the foregoing Motion for *Pro Hac Vice* Admission and Affidavit in Support of Motion was served on February 10, 2011, via Regular Mail on all counsel of record, as follows:

Daniel Charles Girard
Amanda Steiner
Jonathan K. Levine
Regina A. Sandler
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